

## **Exhibit N**

## **Estate of Albert Reingold**

"A"

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
GERTIE REINGOLD**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW JERSEY )

: SS.:

COUNTY OF BERGEN )

GERTIE REINGOLD, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 161 Huguenot Avenue, Englewood, New Jersey 07631.

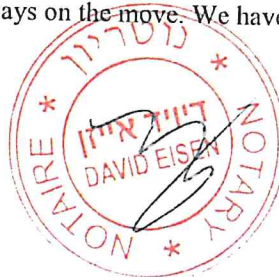
2. I am currently 77 years old, having been born on September 26, 1944.

3. I am the wife of Albert Reingold, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from chronic respiratory disease on March 8, 2015. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On August 4, 2015, I was issued Letters of Administration on behalf of my husband's estate by the State of New Jersey, Bergen County, Surrogate's Court.

6. Albert and I had been together over 50 years at the time of his death. I was 17 years old when I married him, and together we raised three children. Albert was a very active and agile man. He enjoyed bowling, tennis, horseback riding, and swimming. And together, we enjoyed entertaining and going out. He was always on the move. We have a large extended



family, and he had a great relationship with them too. He was everyone's favorite uncle.

7. Albert worked at an office in Lower Manhattan, not far from the World Trade Center. The morning of September 11, 2001, started like any other day, and Albert got on an express bus from Staten Island to Manhattan. As the bus was about to enter the Brooklyn-Battery Tunnel, someone called out that they could see smoke in the distance. The bus entered the tunnel but got stuck about halfway through with Albert and the other passengers on it. The tunnel filled with smoke, and after what I believe was a few hours, the bus driver let everyone out and told them that they were on their own. Albert first started walking toward Manhattan in the smoke before being turned around with others and coming out of the tunnel on the Brooklyn side. He told me that the smoke was so thick that, if you stuck out your arm in front of you, you could not see your fingers.

8. Communication was hard in those days, and neither Albert nor I had a cell phone at the time. I was able to get in contact with a nephew who lived in Brooklyn, and he was able to pick Albert up and bring him home.

9. My husband immediately changed after the September 11, 2001, terrorist attacks. He changed physically, mentally, and emotionally. He stopped doing the activities that he had enjoyed doing. I took him to the doctor that very next day, and the doctor also thought that Albert was already no longer the same person.

10. Albert's office was closed for a while after the attacks. However, it was eventually moved and reopened. The night before he was due to return to the office, he told me that he did not want to go. He did not want to get on the bus and did not want to go through the Brooklyn-Battery Tunnel again. I told him not to worry and suggested that the bus might take an alternate route through New Jersey and avoid the tunnel. However, that would not be the case, and the bus did go through the Brooklyn-Battery Tunnel where Albert had been stuck on September 11, 2001. He tried to act tough and hide his emotions but going through the tunnel gave Albert anxiety. This anxiety started to affect his performance at work. His work suffered, and after two or three months, he was let go. Albert had been a very active man and was not planning on retiring. He had been working and was expected to continue working for a while longer.



11. Albert immediately changed after the attacks, and he soon started having more serious health issues. He developed chronic recurrent pulmonary infections. The following March, Albert had a stroke. And then a few weeks after that, he had another, more serious stroke. Everything in his life began going downhill for him day by day, and he started having various health issues.

12. Albert became physically weak and slowly was able to do less and less. For example, at the beginning of his illness, Albert was still able to do things like make himself coffee. However, as time went on, he was no longer able to but still would try. I would come into the kitchen to find coffee spilled all over the counter. This became true for many other things, like running the house, taking out garbage, and shoveling snow. He also began losing his cell phone and doing irrational things. Every day it was something else, and this became our everyday life. It was not who he was though, and this was not his fault.

13. My husband's emotional state was also negatively affected. He thought television was real, for example. He would also start doing other irrational things. He would tell me that he wanted to go home even though he already was home. So, we would need to get him in the car, drive around for a little while, and return home again. After this, Albert was fine and seemed rational again. He went back and forth between these rational and irrational states. He also suffered from post-traumatic stress disorder. Everything changed for him after that trip into the tunnel on September 11, 2001.

14. About ten years after the attacks, Albert had a major fall down a flight of steps. His balance was totally off, and this was the start of his vascular parkinsonism. I learned that this happened so acutely at this moment in time because it takes about ten years to develop. I also learned that it can be brought on by exposure to toxic fumes, as he was on September 11, 2001. With this and his other health issues, I watched his quality of life decline over about 13 or 14 years.

15. Albert went to so many different doctors. He had a primary doctor, a pulmonary doctor, a movement specialist, a psychologist, and a psychiatrist, among others. Every single one pointed to the attacks as being the cause of his problems.

16. My husband needed constant care, and I helped care for him over the years of his illness. Part of his illness was constant movement, and so it was dangerous to take your eye off

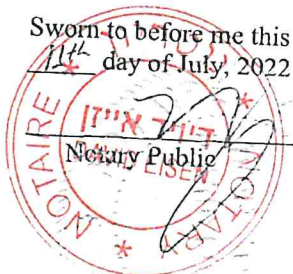


of him. He was unable to accept the fact that he could no longer walk, so he would get up and fall. Because of this, I slept with one eye open or holding his hand for years so that I could monitor him. He also would wake up with hallucinations. This negatively affected both of our sleep. It was not easy.

17. Albert's illness also had a negative financial impact on our family. Because of his illness and the loss of his job, Albert did not work the last 14 or so years of his life, and so we lost that income. His healthcare needs also led to additional expenses, even after we received some financial support from Medicaid for his home healthcare help. It was a huge financial burden, and it came to a point that I had to sell our house. We moved to a small apartment near my kids to live off of what we had received from the sale.

18. I feel that Albert was cheated out of his life, and I feel cheated out of my life with him too. He was a great husband and father. Everyone misses him every day.

  
GERTIE REINGOLD



מס' סידורי 23/22אימות חתימה

אני הח"מ, דיויד אייזן, נוטריון בעל רישיון מספר 21258, מאשר כי ביום 18 ביולי 2022 ניצבה לפני במשרדי ברח' החצב 7א, בית שמש, ה"ה:

גרתי ריינגולד☒ המוכרת לי באופן אישי;

☒ שזהותה הוכחה בפני לשביות רצוני על פי תעודת זהות מס' 337788830 שהוצא על ידי משרד הפנים בנתב"ג ביום 08.10.2013.

ושוכנעתי כי הניצבת בפני הבינה הבנה מלאה את משמעות הפעולה וחתימה מרצונה החופשי על המסמך המצורף והמסומן בא"א.

ולראיה הנני מאמת את חתימתה של גרתי ריינגולד, בחתימת ידי ובחותמי, 18 ביולי 2022.

שכר נוטריון: 198 ₪, כולל מע"מ.

שם נוטר  
Notary's Se

Serial No. 23/22AUTHENTICATION OF SIGNATURE

I, the undersigned, David Eisen, Notary holding license no. 21258, hereby certify that on JULY 18, 2022, the following person appeared at my office at 7A Hehatzav St., Bet Shemesh, Israel:

GERTI REINGOLD☒ who is known to me personally;

☒ whose identity has been proven to me by ISRAEL IDENTITY CARD NO. 337788830 issued by the MINISTRY OF INTERIOR in BEN GURION AIRPORT on OCTOBER 8, 2013.

And I am convinced that the aforementioned person standing before me understood fully the significance of the action and voluntarily signed the attached document marked with the letter "A".

In witness whereof, I hereby authenticate the signature of **GERTI REINGOLD** by my own signature and seal this day, JULY 18, 2022.

Notary Fee: NIS 198, including VAT.



## **Estate of Kevin A. Rooney**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF  
VANEZA A. ROONEY**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK )  
                                  : SS.:  
COUNTY OF ORANGE )

VANEZA A. ROONEY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 510 West 184<sup>th</sup> Street, Apt. 1A, New York, New York 10033.
2. I am currently 40 years old, having been born on September 8, 1981.
3. I am the wife of Kevin Rooney, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from rectal cancer on January 22, 2017, at 38 years old. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On May 11, 2017, I was issued Letters Testamentary on behalf of my husband's estate by the Surrogate's Court of the State of New York, Orange County.

6. Kevin and I were together since 2001. We married in 2002 and were together for 16 years. He was the love of my life. We did everything together. Anytime he was not at work, we were together. We would go to the park to ride bikes, go to the movies together, cook, and talk endlessly. We would spend all day talking and texting. He took care of my daughter and me. He was my everything - my companion, best friend, husband, and soulmate.

7. I remember seeing Kevin during the time he worked at the World Trade Center site. He worked there for many days, long shifts at a time. He would come home with his nostrils full of dust and debris. He would blow his nose and there would be large amounts of dust in his mucus. Kevin would tell me what he would see there was very horrific. He described how a smell of metal and burning flesh hung in the air at the site.

8. Kevin went through hell over the course of his illness. He was in severe pain. Although he was unable to defecate, he would often have to pass blood clots through and bleed out of his anus. He had severe headaches and fevers. His pain was constant, and he was unable to eat and sleep. He suffered a lot. He would cough up pieces of the tumors that were in his lungs. 70% of his liver was riddled with tumors. His colon, liver, and brain were destroyed. All of this caused him to become withdrawn. He spoke less and less. He became trapped in his own head. Due to the severe damage to his liver, he would hallucinate. He wanted to know why all these terrible things were happening to him.

9. Kevin was a man full of life. He was just 38 years old when he passed. Before it all, he was never sick. He was healthy and just got diagnosed out of nowhere. He was never angry. He was always there for anyone who needed him. He was an amazing man with a great heart who helped so many people. Especially with my life and my daughter's life. What he showed us is, even when you're going through the worst of times, never give up. He fought until the end. May 2, 2016, he went to get a physical and was diagnosed. Eight months later, he was gone. I sold my house because it was too much to maintain. The memories of how hard he worked to get the house were too much. I feel lost without him. If he was here, I would not be going through all the things I am going through. Within 8 months, everything changed. From October 2016 until he passed, there were constant trips to the hospital. Kevin had so much life

ahead of him. He was robbed of so many years.

Vaneza A. Rooney  
VANEZA A. ROONEY

Sworn to before me this  
5<sup>th</sup> day of July, 2022

Lori Gai Gano  
Notary Public

LORI GAI GANO  
NOTARY PUBLIC, STATE OF NEW YORK  
REGISTRATION NO. 01GA6346324  
QUALIFIED IN ROCKLAND COUNTY  
COMMISSION EXPIRES 08/08/2024

## **Estate of Robert Carlo Rossi**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

Plaintiffs,

**AFFIDAVIT OF  
ROBIN ROSSI ON BEHALF OF  
THE ESTATE OF ROBERT  
ROSSI**

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NORTH CAROLINA )

: SS.:

COUNTY OF ROWAN )

ROBIN ROSSI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1790 Cranwell Drive, Mount Ulla, NC 28125.

2. I am currently 60 years old, having been born on May 26, 1961.

3. I am the son of Robert Carlo Rossi, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. My father passed away from prostate cancer on April 13, 2016. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My mother, Valerie Rossi, was also a plaintiff in the within action, in which she was pursuing her own solatium claim, as well as a claim on behalf of my father's estate. However, Valerie Rossi passed away on January 17, 2020, subsequent to the filing of this lawsuit. On May 20, 2021, I was issued Letters Testamentary on behalf of my mother's estate by

the Surrogate's Court of the State of New York, County of Suffolk. I am also the presumptive representative of my father's estate.

6. My father was a great family man. He and I were very close. We lived together up until the time of his death. I spent my whole life with him. We worked together, had similar interests, and did many things together. We were both automobile enthusiasts, and often went to car shows and fixed cars together. We also worked together building houses. He was my best friend.

7. My father also had a good relationship with my mom, Valerie Rossi. They were married for over fifty years. They shared a love of Atlantic City and did a lot of things together. They built a home, collected antique dolls, and helped me with many school projects. My parents were truly life partners in every sense. They took great pride in their home and family.

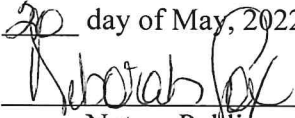
8. My father wasn't in lower Manhattan on 9/11, but he responded to the World Trade Center site soon after. He was a retired FDNY firefighter, so he could get closer to the rubble at Ground Zero than other civilians could. He would go down there with a friend, another former FDNY firefighter, who also ended up passing away due to his exposure. They would bring cases of bottled water for the firemen to flush out their eyes. I know that my father responded to the World Trade Center site at least 5-10 times. He didn't talk about it. Many of them didn't talk about it because what they saw was so traumatizing.

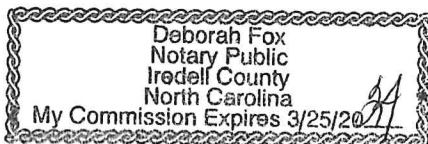
9. In 2012, my dad started to have problems urinating. He kept his illness to himself—he didn't want to worry me or my mother. My mother knew my father was sick before anyone else. He couldn't travel as much as he used to, and he started to have continence issues. In September 2015, he had his first biopsy. He was soon after diagnosed with prostate cancer. That was "the beginning of the end." He resisted going to the doctor because he was a strong-willed person. This created a strain between my parents, because my mother knew that there was a chance my father was very sick.

10. My father's illness was devastating. He deteriorated from a strong individual to someone who couldn't walk, couldn't speak, and had no control of his bodily functions. My mother and I would take him for his cancer treatments, and he would cry out from the pain. He was in excruciating pain, despite the pain medications.

11. First my mother and then I had to become my father's caretakers. I took him to the doctor's office, and I took care of him at home as his health failed. I cleaned him, bathed him, and fed him. Having others care for him like this so difficult for him. It was obvious to us that my dad was in severe pain. I only hope I eased his pain, even if it was just for a little while. Toward the end, he became quiet and despondent. He lost his will to live. I don't know if it was the illness or just accepting his fate, but I just couldn't get any response from him anymore. The doctors told me that the cancer may have spread to his brain. He passed away not too long after the last treatment. He didn't deserve the cards he was dealt. He was just trying to do right by others after the terrorist attacks, and he paid the ultimate price with his life.

  
ROBIN ROSSI

Sworn to before me this  
20 day of May, 2022  
  
Notary Public



**Estate of James Anthony Schiavone**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
LISA SCHIAVONE**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF SUFFOLK    )

LISA SCHIAVONE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 498 North 4<sup>th</sup> Street, Lindenhurst, New York 11757.

2. I am currently 53 years old, having been born on August 29, 1968.

3. I am the wife of James Anthony Schiavone, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from metastatic colon cancer on December 12, 2017, at the age of 49. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On March 19, 2018, I was issued Letters of Administration on behalf of my husband's estate by the New York State Surrogate's Court, Suffolk County.

6. My husband Jimmy was a great man. He was my best friend, and we had been together since I was 14 years old and raised three children together. Family was very important to us, and Sundays were our family day. We would spend it not only with our own children but

also with the nieces and nephews in our extended family. Jimmy was a sports fanatic, and he loved watching the Yankees on television and going bowling. He also coached the children in youth sports, and he was everyone's favorite coach – they would call him "Mr. Softy" because he would say yes to everything. There are so many wonderful memories with him.

7. Jimmy was a detective in the New York City Police Department and on the morning of the September 11, 2001, terrorist attacks, he was going to court in Queens. However, with the attacks, he turned around and headed for lower Manhattan. By the time he got there, the first tower had already fallen. Jimmy would stay at Ground Zero the rest of that day and the next. When he came home the night of September 12th, he was covered in white dust. He told me that he was going to get sick from the experience – I will never forget the conversation. He continued working at Ground Zero for about the next six months. The first three months were more than full-time – he was there about 12 hours a day, every day – as part of the search and recovery efforts. He spent the next three months on "the Pile," as they called it, as part of the cleanup efforts, working about eight to ten hours a day, with some days spent at his command.

8. My husband's experience working at Ground Zero had an emotional impact on him. He did not discuss his experience with me much, but Jimmy developed post-traumatic stress disorder from what he saw and experienced. This was particularly noticeable on each anniversary of the attacks as Jimmy would get a different look on his face and would sit and listen to every name being called.

9. I did not understand the full emotional impact until he got physically sick. At that time, we visited the World Trade Center Health Program for a health interview and physical exam. Part of this health interview was discussing his experience. There was a complete haze and distance in his eyes when he repeated everything that happened, responding to each of their questions. He discussed the smoke in his eyes and face, the smell, and the taste. The smell and taste of working at Ground Zero would never leave him. It was horrible what he told the psychiatrists that day.

10. As Jimmy predicted when he came home from Ground Zero for the first time, he became sick. It was May 2016, and our oldest daughter was graduating from college. It was

graduation week, and Jimmy kept laying on the couch saying that he was exhausted. Hearing him say this reminded me of how my mother had described how she felt when she was sick with cancer, and so I told him to go to the doctor. He would not until after the graduation. While we were at our daughter's college, our daughter commented to me that Jimmy did not look right while we were helping her move out. And when we went out to dinner afterwards, Jimmy's teeth were chattering. This was unusual, as he was the type of person who was never cold and would wear shorts in the winter.

11. My husband went to the doctor after the graduation, and his blood work showed that he was anemic. He was only 46 years old and had never been anemic before. They thought it might be a bleeding ulcer or something similar, but the doctor said that more testing was needed. After more testing showed some of his levels were high, the doctor ordered a colonoscopy and endoscopy. He had these exams done over Memorial Day weekend in 2016. The doctor reported that the endoscopy was ok, but the colonoscopy could not be completed due to a mass in his rectum. The doctor thought it was likely a tumor and in his professional opinion, it would be malignant.

12. There were some celebrations that we attended that weekend, and people commented that Jimmy looked pale like a ghost. After a sonogram about a week later, we returned to see the doctor for a follow-up appointment. When the nurse came in ahead of the doctor, Jimmy had practically resigned himself that the tumor would be malignant. He was able to access the results on his phone before the doctor was able to share them. It was then that Jimmy learned for sure that the tumor was malignant and that he had cancer. After speaking with the doctor, we learned that it was, in essence, stage IV cancer because it had already spread to his liver and stomach. Jimmy would additionally need surgery to remove the tumor and would need a colostomy bag as a result. It was unfathomable. Jimmy became pale as a ghost, and we went out to the car together and cried in the parking lot.

13. Jimmy had the surgery to remove the tumor from his colon and put in the colostomy bag. It was successful but seeing him after the surgery was difficult. He was all bruised and was in so much pain, and this pain would not stop despite pain medication. They had

him so that he couldn't move but could still talk. He was covered in towels, and it looked like he was mummified. I did not even want to see him in such a state.

14. Jimmy was highly embarrassed with the colostomy bag. He did not even want to look at it. I had to help him for the first three months before he eventually became more comfortable with it. It was very hard to see a man that I grew up with become helpless like a child with his health issues. He needed constant care.

15. My husband fought the cancer and began chemotherapy treatments in late June 2016. He was scared at first, but he would go and try to have a good attitude despite having a terminal illness. Jimmy did pretty well with the chemotherapy treatments, although he still suffered from several side effects. He felt weak, had no appetite, and had an odd metal taste in his mouth. He would also later experience what he called "chemo brain," as sometimes his mind would be elsewhere.

16. The following year, in July 2017, Jimmy went to see a specialist at Memorial Sloan Kettering Cancer Center to remove the remaining cancer. As far as we knew at this point, the chemotherapy treatments were working, and so the surgery was scheduled for that August. After the surgery, though, they took me into a private room and explained that they could not complete the surgery to remove the remaining cancer. There was still too much cancer in his stomach and liver. They described it as "snowflakes" and said that if the cancer had been concentrated into one large tumor or a few medium-sized ones, the surgery may have been successful. But that was not the case.

17. My husband had a good attitude about this setback with his treatment, but this would turn out to be the beginning of the end for him. He stayed in the hospital through Labor Day recovering from this surgery before coming home. Unfortunately, after coming home, he got an infection at the surgical site and so we had to bring him back to the hospital. Jimmy was in lots of pain because of this and was in yet more pain when the surgeon made adjustments without anesthesia or anything.

18. This infection also delayed his next round of chemotherapy treatments. By the time these treatments started, it was late September 2021. He had more negative side effects

from this round. He said the chemotherapy burned him and that he felt like he was on fire. He was red from head to toe, had bumps and bruises, and was unable to hold anything down. As time went on, his body began to hold onto more and more liquid, and we would need to go to the emergency room so that the liquid could be drained. This caused Jimmy a lot of pain, and eventually his body became swollen because it was so full of liquid. It came to a point in October that despite efforts, they were no longer able to drain the liquid, and so Jimmy needed to stop his chemotherapy treatments until his body could get back to normal.

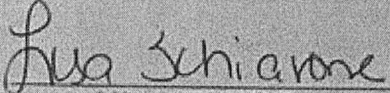
19. On November 11, we had our great nephew's christening at a local church. Jimmy was still very sick, and I told him that he did not need to attend. He insisted though, and so our family went to the church together. Watching him walk from the beginning of the church to a pew was like the longest mile for him – it took forever. He had no strength. He did not join us at the party that followed, but I asked him what he wanted to eat. He said a Caesar salad with feta cheese, and so I got it and brought it to him. That would be the last thing he ever ate.

20. Jimmy stopped eating completely and would be in and out of the hospital for the last month of his life. His cancer had spread, and the chemotherapy treatments were not working. His mobility further decreased, and Jimmy needed help just to move from the couch or to the restroom. When helping him move to the restroom, we would need to hold something for him to vomit into because he was unable to keep anything down. It was no way to live. He also started relying on sleep medication in order to rest at night.

21. He had no strength, no appetite, no quality of life, and was in lots of pain. Strong pain medications would not even help alleviate it. He needed a blood transfusion on December 10th, the prospect of which really scared him, because his blood level was so low. In the middle of the night, they would resuscitate him in order to give family one last opportunity to say goodbye. He would pass away on December 12, 2017, at only 49 years old after suffering from this cancer.

22. What happened to Jimmy is very unfair. He did everything the doctors told him and wanted to get better so badly. We had married and had children early in life so that we could enjoy our retirement, spend time with the grandchildren, and travel. Jimmy lost all these

opportunities. He knew he was going to die and was mad, of course, at the September 11, 2001, terrorist attacks and its aftermath. But he said he would not have done anything differently. That was what he was meant to do. I am proud of him, but my wish is that he did not get sick and was still here with us.

  
LISA SCHIAVONE

Sworn to before me this  
11 day of July, 2022

  
Notary Public

SARAH JANE CAMPBELL  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01CA6280036  
Qualified in Nassau County  
Commission Expires April 15, 2025

**Estate of Joseph M. Scoblic**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF**  
**BARBARA SCOBLIC**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF NEW YORK    )

BARBARA SCOBLIC, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 360 East 72<sup>nd</sup> Street, Apartment A1105, New York, NY 10021.

2. I am currently 82 years old, having been born on July 21, 1939.

3. I am the wife of Joseph M. Scoblic, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from renal cancer and lymphoma on June 16, 2014. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. On June 30, 2015, I was appointed executor of my husband's estate by the issuance of Letters Testamentary by the Surrogate's Court of the State of New York, New York County.

6. My husband and I had a good relationship. We had a strong family bond and raised two sons together. We used to go to museums, go out to dinner in New York City, or just relax at home. He was a healthy man. He exercised every day, ate healthy, and never smoked or drank.

7. Joseph worked for Citibank on 9/11. He was commuting to his office that morning at 388 Greenwich Street. He was walking towards his office when he saw the second plane hit the World Trade Center. Fortunately, he was able to turn around and come home despite the chaos in the city that day. However, as soon as they let him go back, he immediately returned to work. He was a hard worker, and worked 10-12-hour days for his entire career. He rarely missed a day of work in his 38 years of working. On the river, right outside his office, was the barge where they loaded all the debris from the World Trade Center. The barge was located right next to the air intake system for the entire Citibank building. So, he was there, breathing in all the toxic air in the office every single day that he worked.

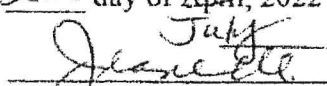
8. Joseph became immediately and noticeably ill after 9/11. In the year following, we probably visited the hospital four or five times. He was diagnosed non-stop with different illnesses. He had blood clots. He was diagnosed with a prostate tumor, a kidney tumor and had lymphoma. He started to show signs of physical decline. He had less energy, had trouble walking, and started to experience memory issues. His physical abilities went from completely normal to noticeably impaired.

9. Before 9/11, Joseph was an extremely healthy and intelligent man. He exercised every day, ate a healthy diet, and he never smoked or drank. Due to his illnesses, he significantly declined both physically and mentally. His entire quality of life drastically worsened. He couldn't be left alone. His balance was increasingly unstable. He was often at risk of falling and had to be constantly monitored. He didn't understand that he needed physical assistance, which led to several calls to 9-1-1, and long days and nights in the emergency room. His sleep was disturbed; he began yelling out in his sleep. His personality changed significantly, often becoming verbally abusive, manipulative, angry and resentful. This led to fractures in my relationship with him and with my sons. It became so bad that we made the difficult decision to place him in a long-term care facility.

10. Joseph had a horrible end to his life, and by the time of his death, our family relationship was nearly destroyed. Our relationship as husband and wife had completely deteriorated. My husband and my family suffered, and we didn't deserve that. No family does.

  
BARBARA SCOBLIC

Sworn to before me this  
24th day of April, 2022

  
Notary Public

JEANETTE RODRIGUEZ  
Notary Public - State of New York  
No. 01RO6281299  
Qualified in New York County  
My Commission Expires May 14, 2024